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Protection*

California Regional Water Quality Control Board Central Valley Region

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3 June 2008

NOTICE OF VIOLATION

Mr. Stevan Stroud
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SOUTH SAN JOAQUIN IRRIGATION DISTRICT ANNUAL MONITORING REPORT REVIEW

The Central Valley Regional Water Quality Control Board staff (Staff) received the South San Joaquin Irrigation District (District) Annual Monitoring Report (AMR) on 28 February 2008, in accordance with the submittal date required by Board Order No. 2003-0827 (Order). Staff has reviewed the AMR and provided comment in the attached memorandum. The memorandum includes the information that the District did not conduct any storm season monitoring during the reporting period.

The rationale for the absence of storm event monitoring was described in a District correspondence dated 18 March, attributing the failure to a change in contract laboratory as well as a training conference attended by monitoring staff. These factors were apparently deemed sufficient by the District to prevent them from collecting the samples required by Section I.4 and I.5 of the Order. For this reason, the District is in violation of the Order and the associated Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands.

For the District to correct the future violations it should obtain the services of back-up monitoring staff or make alternative arrangements so that storm events are monitored as required. Failure to conduct the storm season monitoring event next year will subject the District to further enforcement action, including administrative fines.

The District also must submit an addendum to their Quality Assurance Project Plan (QAPP) in order to be able to use the herbicide, prodiamine, as well as the QAPP from the new laboratory that will be conducting this analysis. Please submit this documentation by **30 June 2008**.

Finally, the Order requires that the District submit monitoring data in tabular format (see MRP Order R5-2003-0827, page 9). This same comment was made in the Staff letter for the 2006 AMR, and the District has not yet made this correction.

Other comments are detailed in Staff's 2007 Annual Monitoring Report Review memorandum, which is enclosed with this letter.

If you have any questions regarding this Notice of Violation and the attached review, please contact Chris Jimmerson at cjimmerson@waterboards.ca.gov, or (916) 464-4859.

Original Signed By
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Senior Environmental Scientist

Original Signed By
JOE KARKOSKI, Supervisor
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Enclosure: Staff Review of SSJID AMR